

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

C.A. NO. 1:22-cv-11060-PBS

**JOEL JEANNITE,
Plaintiff**

v.

**WRIGHT, LAYDEN 2187, JOHN DOE 1904,
AND AKIKI AND SON.
Defendants**

**DEFENDANTS, WRIGHT AND LAYDEN 2187'S
MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

Defendants Wright and Layden 2187 (collectively "City defendants") respectfully move pursuant to Fed. R. Civ. P. 12(b)(5) and 12(b)(6) to have this Honorable Court dismiss Plaintiff's complaint in its entirety against them. Plaintiff, Joel Jeannite ("plaintiff"), appearing *pro se*, brings his complaint against the City defendants alleging constitutional violations among various other allegations. As grounds for the City defendants' motion to dismiss, Plaintiff did not properly serve the City defendants and Plaintiff's complaint fails to state a claim.

In support of the motion, the City submits this motion and accompanying memorandum of law. For the foregoing reasons set forth herein and in the accompanying memorandum, the City defendants respectfully request that this Honorable Court dismiss Plaintiff's complaint in its entirety.

Respectfully submitted,

Respectfully submitted:

**WRIGHT and
LAYDEN 2187**

By their attorneys:
Adam N. Cederbaum
Corporation Counsel

/s/ Bridget I. Davidson
Bridget I. Davidson (BBO# 710244)
Assistant Corporation Counsel
City of Boston Law Department
City Hall, Room 615
Boston, MA 02201
(617) 635-3238
bridget.davidson@boston.gov

CERTIFICATE OF SERVICE

I, Bridget I. Davidson, hereby certify that I served a true copy of the above document upon all registered parties via this court's electronic filing system on January 19, 2023 and mailed the same to *pro se* Plaintiff through U.S. mail.

/s/ Bridget I. Davidson
Bridget I. Davidson

7.1 CERTIFICATION

I, Bridget I. Davidson, hereby certify that I was unable to confer with Plaintiff regarding the requested relief as Plaintiff did not include a phone number or email address on his pleadings.

/s/ Bridget I. Davidson
Bridget I. Davidson